

## **REMARKS**

Claims 1-5, 10-14, 19-21, 23-29 and 32-40 have been amended. Claims 1-40 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

### **Section 101 Rejection:**

The Office Action rejected claims 32-40 under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. Claims 32-40 have been amended to recite a “computer-accessible storage medium comprising program instructions, wherein the program instructions are computer-executable to implement...” Accordingly, removal of the § 101 rejection of claims 32-40 is respectfully requested.

### **Section 102(e) Rejection:**

The Examiner rejected claims 1-40 under 35 U.S.C. § 102(e) as being anticipated by Takaoka, et al. (U.S. Publication 2003/0085914) (hereinafter “Takaoka”). Applicants respectfully traverse this rejection for at least the following reasons.

In regard to claim 1, the Examiner cites FIG. 8, host system [1021], storage devices [1041], and paragraph 63 “where fibre channel ports indicate a fabric” in support of the assertion that Takaoka discloses a *zone visualization mechanism configured to obtain zoning information for a plurality of Storage Area Network (SAN) objects in a SAN, wherein the SAN comprises one or more host systems, one or more storage devices, and one or more fabrics*. None of the citations provided by the Examiner teach a zone visualization mechanism configured to obtain zoning information for a plurality of SAN objects in a SAN.

In further regard to claim 1, contrary to the Examiner’s assertion, Takaoka does not teach or suggest a *zone visualization mechanism configured to, in response to*

*selection of a particular SAN object in the SAN, display zoning information for the selected SAN object, wherein the zoning information for the selected SAN object indicates one or more zones of the SAN of which the selected SAN object is a member.* The Examiner cites paragraph [0102] in support of this assertion, which reads (emphasis added):

To generate a zone, the user generates an area on the screen 1000 and then moves in the area by a pointing device 25 a symbol of a storage device port and a symbol of a computer port to be added to a new zone to be created. To delete a zone, the user delete[s] an area corresponding to the zone by a menu operation.

It is clear from the above citation that Takaoka is **not** describing *in response to selection of a particular SAN object in the SAN, displaying zoning information for the selected SAN object, wherein the zoning information for the selected SAN object indicates one or more zones of the SAN of which the selected SAN object is a member*. In the citation, Takaoka describes that the user generates an “area on the screen” to represent a zone, and then selects objects (e.g., a symbol of a storage device and a symbol of a computer port) and moves the objects into the area representing the zone. These actions are performed in a process of adding the objects to a new zone to be created. The zone does not actually exist; the zone has not yet been created. Therefore, the objects moved into the zone on the screen are not in an actual zone on the SAN, as the zone has not yet been created. In contrast, claim 1 recites that, in response to selection of a particular SAN object, zoning information for the particular SAN object is displayed. The displayed zoning information indicates one or more zones of the SAN of which the selected SAN object **is** a member. Claim 1 is directed at displaying zoning information about selected SAN objects that are already in actual zones on the SAN as determined by the zone visualization mechanism.

Contrary to the Examiner’s assertion that “the SAN object is moved into a generated area (a zone) on the screen, thereby displaying the object is a member of the zone,” the citation from Takaoka does not teach that zoning information is displayed for the selected SAN object which indicates one or more extant zones of the SAN of which the selected SAN object is a member. It is clear from the citation that the area that

objects are moved into simply represents a zone that has not yet been created, and thus the objects moved into the area are not members of an extant zone on the SAN. Takaoka clearly states that the area on the screen only represents a new zone to be created, and not an extant zone.

Furthermore, the Examiner asserts in regard to Takaoka “the SAN object is moved into a generated area (a zone) on the screen, thereby displaying the object is a member of the zone.” In Takaoka, the area representing a new zone to be created is clearly displayed prior to the user selecting an object to be moved. The user simply moves the object into the displayed area representing the new zone to be created (again, which is not an extant zone of the SAN of which the selected object is a member). In contrast, in claim 1 of the instant application, zoning information for a selected SAN object, indicating one or more zones of the SAN of which the selected SAN object is a member, is displayed in response to selection of the SAN object. Claim 1 recites nothing like the user moving the SAN object into another area to “display the object is a member of the zone.” In claim 1, simply selecting the SAN object causes zoning information to be displayed. In addition, the displayed zoning information for the selected SAN object indicates one or more zones of the SAN of which the selected SAN object is a member

Thus, for at least the reasons presented above, the rejection of claim 1 is not supported by the cited prior art and removal thereof is respectfully requested. Similar remarks as those above regarding claim 1 also apply to claims 10, 19, 23 and 32.

In regard to claim 2, contrary to the Examiner’s assertion, Takaoka does not teach or suggest *wherein the displayed zoning information indicates logical zone membership for the selected SAN object, wherein a SAN object is a logical member of a zone via relationship of the SAN object to one or more other SAN objects that are physical members of the zone*. The Examiner cites paragraph [0112] in support of this assertion, which reads (emphasis added):

Each procedure accesses the tables 3100, 1600, and 3900 to obtain, using the logical unit identifier received as a parameter, an identifier of a storage device in which the logical unit is arranged. To conduct an operation for a

storage device, a port of the storage must be specified. A value for the port can be obtained from the fourth item of the table 3900. According to the values obtained as parameters, each procedure uses the unit provided by the vendor of the storage device as a unit opened to the public to thereby conduct operation for the LUN security.

Takaoka, in this selection is describing “logical units” (LUNs) in respect to SANs and in regards to setting LUN security. This selection is not describing and has nothing to do with the different and distinct notion of logical zone membership of SAN objects, wherein a SAN object is a logical member of a zone via relationship of the SAN object to one or more other SAN objects that are physical members of the zone, as is recited in claim 2.

Thus, for at least the reasons presented above, the rejection of claim 2 is not supported by the cited prior art and removal thereof is respectfully requested. Similar remarks as those above regarding claim 2 also apply to claims 11, 20, 24 and 33.

In regard to claim 4, contrary to the Examiner’s assertion, Takaoka does not teach or suggest *wherein the displayed zoning information for a zone of which the selected SAN object is a member further indicates one or more other SAN objects through which the selected SAN object is a logical member of the zone, wherein a SAN object is a logical member of a zone via relationship of the SAN object to one or more other SAN objects that are physical members of the zone.* The Examiner cites paragraph [0102] in support of this assertion, and asserts “wherein a computer port can be added to the same zone as a storage device.” In the citation, as noted above, Takaoka describes that the user generates an “area on the screen” to represent a zone, and then selects objects (e.g., a symbol of a storage device and a symbol of a computer port) and moves the objects into the area representing the zone. These actions are performed in a process of adding the objects to a new zone to be created. The zone does not actually exist; the zone has not yet been created. Therefore, the objects moved into the zone on the screen are not in an actual zone on the SAN, as the zone has not yet been created. Moreover, Takaoka is describing a process that may result in the objects being added as physical objects in the zone. This selection is not describing and has nothing to do with the different and

distinct notion of logical zone membership of SAN objects, wherein a SAN object is a logical member of a zone via relationship of the SAN object to one or more other SAN objects that are physical members of the zone. The citation does not describe, in response to selection of a SAN object, displaying zoning information for a zone of which the selected SAN object is a member, wherein the displayed zoning information indicates one or more other SAN objects through which the selected SAN object is a logical member of the zone.

Thus, for at least the reasons presented above, the rejection of claim 4 is not supported by the cited prior art and removal thereof is respectfully requested. Similar remarks as those above regarding claim 4 also apply to claims 13, 26, and 35.

**Section 103(a) Rejection:**

The Examiner rejected claims 3, 12, 25 and 34 under 35 U.S.C. § 103(a) as being unpatentable over Takaoka as applied to claims 1, 10, 19, 23 and 32 above, and further in view of Bramhall, et al. (U.S. Publication 2003/0195956) (hereinafter “Bramhall”). Since the rejections have been shown to be unsupported for the independent claims, a further discussion of these rejections is not necessary at this time.

In regard to the Section § 102(e) and the Section § 103(a) rejections, Applicants also assert that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejections have been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

## CONCLUSION

Applicants submit the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5760-15500/RCK.

Respectfully submitted,

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